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7

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 CHERE B. GOOCH-MARTIN,

11 Plaintiff,

12 v.

13 CAROLYN W. COLVIN,
Acting Commissioner of Social
14 Security,

15 Defendant.

Case No.: 2:13-CV-01638-GMN-PAL

16 **UNOPPOSED MOTION FOR EXTENSION OF TIME**
17 **(Second Request)**

18 COMES NOW Defendant Carolyn W. Colvin, Acting Commissioner of Social Security
19 (Defendant), by and through her counsel, Daniel G. Bogden, United States Attorney, and Marla K.
20 Letellier, Special Assistant United States Attorney, to request that this Court extend the time to
21 respond to Plaintiff's Motion for Reversal and/or Remand, which was filed on February 5, 2014, by
22 one week. This is Defendant's second request for an extension of time. Counsel for Defendant
23 contacted Plaintiff's counsel on April 17, 2014, and Plaintiff does not oppose Defendant's motion.
24 Defendants' current deadline is April 21, 2013.

25 The instant request is not intended to cause delay and is necessary because of the heavy
26 workload of Defendant's attorney assigned to this case. Defendant's counsel has five District Court

1 briefs due between April 14, 2014 and April 23, 2014, including two due on April 21, 2014, as well as
2 a draft Ninth Circuit brief and other agency matters. Additionally, counsel was out of the office on
3 April 10-11, 2014.

4 It is therefore respectfully requested that Defendant be granted a short seven (7) day extension
5 of time to respond to Plaintiff's motion, up to and including April 28, 2014.

6 Dated: April 17, 2014.

7 Respectfully submitted

8 DANIEL G. BOGDEN
9 United States Attorney

10 /s/ Marla K. Letellier
11 MARLA K. LETELLIER
Special Assistant United States Attorney

12 OF COUNSEL:

13 DONNA L. CALVERT
14 Acting Regional Chief Counsel
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16 IT IS SO ORDERED:

17 
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: April 22, 2014
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CERTIFICATE OF SERVICE

I, Marla K. Letellier, certify that the following individual(s) were served with a copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date, and via the method of service, identified below:

CM/ECF:

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Dated this 17th day of March, 2014

/s/ Marla K. Letellier
MARLA K. LETELLIER
Assistant United States Attorney